METHFESSEL & WERBEL, ESQS. 3 Ethel Road, Suite 300 PO Box 3012 Edison, New Jersey 08818 (732) 248-4200 Attorneys for Coastal Title Agency Our File No. 45987 MRM

WALSH SECURITIES, INC.

Plaintiff,

V.

CRISTO PROPERTY MANAGEMENT, LTD., A/K/A G.J.L. LIMITED, DEK HOMES OF NEW JERSEY, INC., OAKWOOD PROPERTIES, INC., NATIONAL HOME FUNDING, INC., CAPITAL ASSETS PROPERTY MANAGEMENT & INVESTMENT CO., INC., CAPITAL ASSETS PROPERTY MANAGEMENT, L.L.C., WILLIAM J. KANE, GARY GRIESER, ROBERT SKOWRENSKI, II, RICHARD CALLANI, RICHARD DIBENEDETTO, JAMES R. BROWN, THOMAS BRODO, RONALD J. PIERSON, STANLEY YACKER, ESQ., MICHAEL ALFIERI, ESQ., RICHARD PEPSNY, ESQ., ANTHONY M. CICALESE, ESQ., LAWRENCE M. CUZZI, ANTHONY D'APOLITO, DAP CONSULTING, INC., COMMONWEALTH LAND TITLE INSURANCE COMPANY, NATIONS TITLE INSURANCE COMPANY OF NEW YORK, INC., FIDELITY NATIONAL TITLE INSURANCE COMPANY OF NEW YORK, COASTAL TITLE AGENCY AND STEWART TITLE GUARANTY COMPANY, IRENE DIFEO, DONNA PEPSNY, WEICHERT REALTORS, AND VECCHIO REALTY, INC. D/B/A MURPHY REALTY BETTER HOMES AND GARDENS.

Defendants.

UNITED STATES DISTRICT - NEWARK : CV 97-3496 (WGB)

Civil Action

DEFENDANT COASTAL TITLE AGENCY'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS Pursuant to Rule 34, Federal Rules of Civil Procedure, you are requested to produce as provided below the following and to file a written response to this report.

**METHFESSEL & WERBEL, ESQS.** Attorneys for Coastal Title Agency

By:\_\_\_\_

*\_\_\_\_\_* 

Martin R. McGowan

Dated: June 7, 2005

## DOCUMENTS TO BE PRODUCED FOR INSPECTION AND COPYING

- Any documents that support any answers to interrogatories made by you.
- 2. Any documents that support any claim you make against the party serving this Request for Production of Documents, including but not limited to any documents that support any cross claims.
- 3. Any documents that support any claims you make against any other party, including but not limited to any cross claims against any party.
- 4. Any documents that support any affirmative and/or separate defenses pled by you.
- 5. Any documents that you contend are admissions of any party.
- 6. Any documents that you contend are declarations against interest of any party or any witness.
- 7. Any documents that are referred to in any answer to any interrogatory made by you.
- 8. Any documents consulted by you in answering any interrogatory.
- 9. Any documents produced by you to any other party in this litigation (hereinafter "any other party").
- 10. Any answers to interrogatories of any other party made by you.
- 11. Any answers to interrogatories received by you from any other party.